

SITE BRIEFING & OPTIONS PAPER

Diamond Vogel/Site Deletion

PURPOSE

Diamond Vogel, PRP of the Vogel Paint & Wax site in Maurice, IA, has requested their site be deleted from the NPL upon achieving containment of the groundwater plume within the property boundary. A decision needs to be made on the path to reach deletion and whether to modify the site decision documents.

CURRENT SITE STATUS

- Groundwater contamination above MCLs exist both on and off site.
- A groundwater pump and treat system has been operating on site. Currently the system is off to allow for a pilot study.
- A bioremediation pilot study is underway to address off site contaminated groundwater migration. It is anticipated that groundwater contamination above MCLs will remain on site after the pilot is completed.
 - Off site groundwater contamination however is anticipated to be below MCLs.
 - 6-month sample results will be evaluated to determine progress of pilot study.

SITE BACKGROUND

- **Contamination:** Paint wastes and solvents were disposed of in a 2-acre pit between 1971-1979 on a non-contiguous 80-acre parcel. Site soils and groundwater contaminated with VOCs (BTEX) and metals.
 - Site was listed on the NPL in the late 1980's
 - EPA and IDNR entered into a Memorandum of Understanding in June 1990 delegating the lead oversight responsibilities to IDNR.
- **Cleanup:** 1989 ROD called for excavation and bio-remediation of soils and groundwater extraction and treatment.
 - The soil remedy has been fully implemented (OU1); treated soils were placed in an onsite repository and capped in place.
 - The groundwater pump and treat system has been in place since 1992 (OU2).
 - ESDs were signed in 1994 and 2000 calling for various remedy modifications. The 2000 ESD established the point of compliance for achieving MCLs at the site boundary. EPA concurred on ROD and ESDs.
- **ICs:** Currently ICs are defined by IDNR and Vogel as being on the Iowa registry of Hazardous Waste or Hazardous Substance Disposal Sites
- **Additional Background:**
 - IDNR signed CD with Vogel in 1989---- whereby Vogel agreed to implement the selected remedies for soils and GW at the site.
 - IDNR allowed Vogel to intermittently shut down the pump and treat system over the course of many years, which has led to offsite migration of contamination in excess of MCLs.
 - EPA took back the lead for FYRs in 2014 due to conflicts between EPA and IDNR regarding the status of the GW remedy.
 - Nearby residents on rural water supply; private wells used for non-household purposes do not show impacts from the site.
 - Surrounding land use is predominantly agricultural.
 - SEE ATTACHED SITE MAP for more information

SITE ISSUE & CONSIDERATIONS

Existing remedy decisions call for cleaning up groundwater to achieve MCLs within the property boundary, the “point of compliance”. EPA policy calls for restoring groundwater to its beneficial use throughout entire plume. This national policy presents a potential barrier to deletion.

- Vogel is pushing for site deletion and is strongly opposed to changing the “point of compliance” approach to groundwater remediation.
- Vogel is against decision document modifications; they believe it would create a negative public impact.

Diamond Vogel recently contacted Peter Wright and Jim Gulliford as well as Senators Joni Ernst and Chuck Grassley concerning these issues. A meeting was held between EPA, Diamond Vogel and IDNR to discuss Point of Compliance issues on February 12, 2020. It was decided that the group would meet again after the 6 month groundwater sample results have been received.

PROPOSED OPTIONS

Ex. 5 Deliberative Process (DP)

Cons:

Ex. 5 Deliberative Process (DP)

NEXT STEPS

July 2020

Evaluate bioremediation pilot study after groundwater samples are collected at the 6 month timeframe.

September 2020

IDNR and Vogel have expectations of meeting with headquarters to discuss path forward to deletion once 6 month groundwater samples have been evaluated from the pilot study.

September 2020

Make decision on the path forward for the site.

Site Map | Vogel Paint & Wax Company

Maurice, Iowa

EPA ID#: IAD980630487

SSID: 071M

